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ATTORNEY FOR PLAINTIFF

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DIVISION OF CALIFORNIA
SAN JOSE DIVISION

NOEMIA CARVALHO, et al..

Case No. C 08-1317 JF (HRL)

Plaintiff.

**DECLARATION OF NOEMIA
CARVALHO IN SUPPORT OF MOTION
TO CERTIFY CLASS ACTION**

vs.

CREDIT CONSULTING SERVICES, INC.
dba CCS, et al.,

Defendants

DATE: September 26, 2008
TIME: 9:00 a.m.
DEPT: COURTROOM 3

I, Noemia Carvalho, declare as follows:

1. I am the plaintiff and class representative in this matter.
2. In October of 2001, I obtained medical treatment at a facility called Bayside Medical Group. I was covered for treatment and all bills incurred therefor by my insurer, Blue Cross of California as enrolled through my employer's (Waste Management) health benefits plan. In March of 2003, Bayside informed me that the bill had not been paid for these services. I did some research and determined that Bayside had billed Blue Shield of California instead of Blue Cross of California for the medical treatment. I informed Bayside of this fact on several occasions and requested that

1 Beside resolve the matter with Blue Cross of California. It appears that Bayside then assigned the
 2 debt to a debt collector and I began receiving debt collection notices from the debt collector.
 3 3. In approximately August of 2004, I began noticing that my credit report contained an entry
 4 from the debt collector and Bayside contending I owed them money for the treatment provided.
 5 Beginning in September, 2004, I complained to Bayside, the debt collector (CCS) and each of the
 6 defendant consumer reporting agencies about this item's inclusion on my consumer credit report.
 7 In doing so, I provided 15 pages of documentation showing what was disputed and why and
 8 identifying, amongst, other things, the various entities involved, their addresses and the phone
 9 numbers of contact people. However, the derogatory item was not and has not been removed
 10 from my consumer credit report anytime before complaint was filed, nor thereafter. A true and
 11 correct copy of my letter and attachments are shown by the documents produced by the defendant
 12 CRAs in response to discovery and attached as Exhibit A to the Declaration of Ron Bochner,
 13 Equifax 5-28, 71-82, Exhibit B, Experian 1-17, 20-22 and Exhibit C, Trans Union 51-67, 177-
 14 180.

15
 16 I declare under penalty of perjury under the laws of the State of California that the above
 17 is true and correct.

18
 19 Sworn at the City of _____ County of _____, State of
 20 _____ this ____ day of July, 2008.

21
 22
 23
 24 BY _____
 25 NOÉMIA CARVALHO
 26